CORE Advocacy for Nuclear & Aerospace Workers

818.450.7988 speak@coreadvocacy.org 20309 Leadwell Street, Winnetka CA 91306

Advisory Board on Toxic Substances and Worker Health (ABTSWH)
U.S. Department of Labor
Frances Perkins Office Building
200 Constitution Avenue, NW
Washington, DC 20210

July 28, 2021

Subject: The Addition of CLL-SLL to the List of Specified Cancers

Dear Advisory Board Members:

Thank you for your continued dedication to nuclear workers and claimants under the Energy Employee Occupational Illness Compensation Program (EEOICPA, or "the Act").

In 2018, I brought attention to the need to add Chronic Lymphocytic Leukemia (CLL) to the List of 22 Specified Cancers, based on its reclassification and the assignment of new nomenclature. The condition is now known as Chronic Lymphocytic Leukemia - Small Lymphocytic Lymphoma, or "CLL-SLL."

- CLL was recognized as a cancer caused by exposure to ionizing radiation, years ago.
- The National Cancer Institute (NCI) defines CLL as "the same disease" as SLL.
- SLL has been on the List of 22 Specified Cancers since the List's creation.
- CLL has been reclassified as analogous to SLL, and new nomenclature is used by NCI: "CLL-SLL."
- CLL-SLL should be reflected on the List of 22 Specified Cancers, accordingly.

Department of Labor's (DOL) apparent reluctance to acknowledge NCI's current cancer definition and terminology is preventing EEOICPA claimants with CLL-SLL from qualifying under the Special Exposure Cohort (SEC), particularly when claimants' medical records pre-date the change in cancer classification. Their medical records may simply use outdated and singular terminology (i.e. "CLL"), rather than reflect the current and accepted cancer nomenclature that today would be, "CLL-SLL."

I am hopeful that the Advisory Board will recommend DOL's recognition of NCI's cancer definition that acknowledges CLL and SLL to be "the same disease," reclassified under newer and accepted cancer terminology. The List of Specified Cancers should be updated to reflect recent, relevant science regarding up-to-date cancer classification and terminology, and it should include CLL-SLL.

Thank you for your consideration.

Sincerely,

D'I ania Blaza

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